

REMARKS

1. Summary of Office Action

In the Office Action mailed August 4, 2006, claims 1-15 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 6,910,074 (Amin '074) in view of US. Patent No. 6,668,167 (McDowell '167).

2. Status of the Claims

Now pending in this application are claims 1-15, of which claim 1 is independent.

3. Status of the Specification

As indicated above, Applicants have amended the specification to correct minor typographical errors. No new matter has been added.

4. Summary of Claimed Invention

Applicants' claimed invention is generally directed to a method of bridging two communication sessions on a predetermined network device, such as a conference server. Applicants' specification explains that the conference server bridges the connections "internally in order to establish end-to-end RTP sessions between users." For instance, as illustrated by the dotted lines in Figure 2, conference server 108 internally bridges communication sessions between wireless phone 202 and SIP telephone 214.

On page 26, lines 4-5, Applicants' specification explains that the "user agents are not aware of a local IP address and an RTP port associated with the destination entity." Alternatively, the user agents "have the knowledge of IP address and RTP port on the conference server 108." *Id.* at page 26, lines 5-6. Applicants' specification continues to explain that "[w]hen the conference server 108 bridges the RTP connections between the UA-A [(User Agent-A)] 370 and an appropriate RTP session associated with the UA-B [(User Agent-B)] 372,

the conference server 108 responds with a 200 OK message 416, and the conference server 108 may forward RTP packets between the UA-A [(User Agent-A)] 370 and the UA-B [(User Agent-B)] 372, as indicated by status bar 418.” *Id.* at page 26, lines 6-9. As shown in Figure 4A, status bar 418 indicates that packets are forwarded directly from UA-A 370 to UA-B 372.

Thus, according to Applicants’ claimed invention, when a message is sent from a first user terminal to a second user terminal, a communication session that directly links the two user terminals is not established. Rather, the conference server 108 uses the established communication sessions between the conference server 108 and each of the user agents (UA-A 370 to UA-B 372) to bridge the two communication sessions together. In this regard, as noted above, Applicants’ specification explains that “user agents are not aware of a local IP address and an RTP port associated with the destination entity.” *Id.* at page 26, lines 4-5.

As an example, on page 18, lines 8-10, Applicant’s specification explains that “when a user selects a list of intended recipients and selects a talk button on a user terminal, the conference server 108 internally bridges RTP connections between the user and the recipients specified by the user.” Applicant’s specification continues to explain that “[s]ince the call set up as well as differences in end user codecs and other device features are resolved ahead of time as part of the registration and subscription processes, when a user selects a talk button, the user instantly sends a real-time voice message to the intended recipients.” *Id.* at page 18, lines 10-13.

Thus, in this regard, Applicants’ independent claim 1 specifically recites a method of “bridging the first communication session to the second communication session on the predetermined network device”.

It should be understood that the preceding brief summary is intended to call attention to only certain aspects of Applicants’ invention that are relevant to the following discussion.

Consequently, the summary should not be viewed as encompassing all aspects previously disclosed and/or claimed, nor limiting the scope of Applicants' presently claimed invention in any new manner.

5. Response to Examiner's Rejections under 35 U.S.C. § 103(a)

As noted above, independent claim 1 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Amin '074 and McDowell '167.

Under M.P.E.P. § 2143, in order to establish a *prima facie* case of obviousness of a claim over a combination of references, the Office Action must establish that the combination discloses or suggests every element recited in the claim. Applicants respectfully traverse the obviousness rejection of these claims since the Office Action has not established that the combination of Amin '074 and McDowell '167 teaches every element of independent claim 1. In particular, the Office Action has not established that the combination teaches or suggests a method of "bridging the first communication session to the second communication session on the predetermined network device".

On pages 3-4, the Office Action conceded that Amin '074 does not teach a method of "bridging the first communication session to the second communication session on the predetermined network device." Thus, the sole issue is whether McDowell '167 makes up for this deficiency in Amin '074. On pages 3-4 of the Office Action the Examiner cited "elements of fig 1 and fig 2, lines 23-39" in McDowell '167 in an effort to establish Applicants' claimed invention. Applicants have reviewed these portions (and the patent as a whole) and submits that McDowell '167 clearly does not make up for Amin '074's deficiency of "bridging the first communication session to the second communication session on the predetermined network device".

Rather, McDowell '167 teaches a method of routing messages via a gateway from one remote device to another. For instance, to illustrate, Figure 1 in Mc Dowell '167 depicts laptop computers 48, wireless PDA's 50, and other remote devices 53 that are connected via wireless access to a wireless packet data network 44. See McDowell '167 at Figure 1, and at column 5, lines 30-33. In reference Figure 1, to McDowell '167 teaches that "[w]ireless packet data network 44 is connected via a gateway 42 to fixed IP network 12." *Id.* at column 5, lines 34-36.

According to McDowell '167, these messages are sent by using instant messaging clients such as ICQ, Yahoo, and AOL Instant Messenger. See McDowell '167 at column 5, lines 25-27. In an instant messaging system, an intended recipient's IP address is used to route messages. For example, McDowell '167, in column 2, lines 63-67, teaches that "[w]hen a cellular user logs onto his cellular network, the various instant messaging services are notified of the cellular user so that an individual at a fixed IP network address can send instant messages or make telephone calls to the cellular user as appropriate." Thus, McDowell '167 teaches a method of interconnecting user devices by using a device's fixed IP address to send messages via an instant messaging client.

In contrast, Applicants' claimed invention recites a method of bridging a first *communication session* to a second *communication session* on a predetermined network device. Applicants submit that simply using an IP network address to route messages via gateways does not amount to *bridging two communication sessions at a predetermined network device* so that user terminals may be able to communicate with one another directly via the bridged communication sessions on the predetermined network device. McDowell '167 neither discloses nor suggests a method of bridging a first communication session to a second communication session on a predetermined network device.

For at least this reason, Applicants submit that McDowell '567 fails to make up for Amin 074's deficiency of "bridging the first communication session to the second communication session on the predetermined network device". Because the combination of Amin '074 and McDowell '167 fails to teach or disclose all of the elements of any of Applicants' independent claim 1, Applicants submit that a *prima facie* case of obviousness has not been made. Therefore, Applicants submit that independent claim 1 is allowable. Each of dependent claims 2-15 depends from, and thus incorporates all of the limitations of independent claim 1. Thus, for at least the same reason, dependent claims 2-15 are also allowable.

6. Conclusion

Applicants respectfully submit that, in view of the remarks above claims 1-15 are in condition for allowance and solicit action to that end. If there are any matters that may be resolved or clarified through a telephone interview, the Examiner is respectfully requested to contact Applicants' undersigned representative at (312) 913-0001.

Respectfully submitted,

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